

WINDELS MARX LANE & MITTENDORF, LLP

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*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RECKSON GENERATION; TODD RECHLER,
individually, and in his capacity as Partner of
RECKSON GENERATION; TRUST FBO TODD
RECHLER; GLENN RECHLER, individually, and
in his capacity as Partner of RECKSON
GENERATION; TRUST FBO GLENN RECHLER
U/W/O WILLIAM RECHLER; MITCHELL

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05135 (SMB)

RECHLER, individually, and in his capacity as Partner of RECKSON GENERATION; TRUST FBO MITCHELL RECHLER; SCOTT RECHLER, individually, and in his capacity as Partner of RECKSON GENERATION; GREGG RECHLER, individually, and in his capacity as Partner of RECKSON GENERATION; MARK RECHLER; individually, and in his capacity as Partner of RECKSON GENERATION; TRUST FBO MARK RECHLER; and DONALD RECHLER, as Trustee for TRUST FBO MARK RECHLER, TRUST FBO GLENN RECHLER U/W/O WILLIAM RECHLER, TRUST FBO MITCHELL RECHLER, and TRUST FBO TODD RECHLER,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: December 21, 2015.
2. Fact Discovery shall be completed by: January 20, 2017.
3. The Disclosure of Case-in-Chief Experts shall be due: April 11, 2017.
4. The Disclosure of Rebuttal Experts shall be due: June 12, 2017.
5. The Deadline for Completion of Expert Discovery shall be: July 12, 2017.
6. The Deadline for Service of a Notice of Mediation Referral shall be: July 19, 2017.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: August 2, 2017.
8. The Deadline for Conclusion of Mediation shall be: November 30, 2017.

Dated: New York, New York
October 15, 2015

WINDELS MARX LANE & MITTENDORF,
LLP

By: /s/ Howard L. Simon

Howard L. Simon

Kim M. Longo

John J. Tepedino

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New York, NY 10019

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Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*